

EXHIBIT 13

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
CHANEL, INC.,

Plaintiff,

Case No. 18-cv-2253(LLS)

- against -

WGACA, LLC, WHAT COMES AROUND GOES
AROUND LLC d/b/a/ WHAT GOES AROUND COMES
AROUND, MHW PROPERTIES, INC., WGACA WEB,
LLC, PINES VINTAGE, INC., VINTAGE DESIGNS
LTD., and WCAGA LA, LLC,

**RULE 26 AUTOMATIC
DISCLOSURE STATEMENT**

Defendants

-----X

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, Defendants WGACA, LLC, WHAT COMES AROUND GOES AROUND LLC d/b/a/ WHAT GOES AROUND COMES AROUND, MHW PROPERTIES, INC., WGACA WEB, LLC, PINES VINTAGE, INC., VINTAGE DESIGNS LTD., and WCAGA LA, LLC, by their attorneys Lewis Brisbois Bisgaard & Smith LLP, state as follows:

A. Persons Likely to Have Pertinent Information Relevant to Disputed Facts in the Pleadings

Name	Address	General Subject Matter of the Discoverable Information
Seth Weisser	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold.
Gerard Maione	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold.
Frank Bober	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold.

Paige Rubin

c/o counsel

Defendant WGACA business and acquisition practices for goods being resold and evaluation procedures.

Probable but as yet unknown experts relating to the industry, consumer surveys and damages claimed by Chanel.

Other persons with knowledge, if any, will be identified during the course of discovery. Defendants reserve the right to identify any additional witnesses during the course of discovery including, but not limited to, any witnesses identified by plaintiff.

B. Description by Category of All Documents and Things in Defendants' Custody and Control Relevant to Disputed Facts Alleged with Particularity in the Pleadings

Documents relating to purchase and re-sale of Chanel products. Documents relating to the procedures of WGACA to authenticate the luxury products it obtains for resale. Documents relating to Defendant's advertising of the luxury products it re-sells.

Defendants reserve the right to supplement this response in the event they become aware of additional documents in their possession, custody or control.

C. Computation of Damages Claimed by Disclosing Party

Defendants are not seeking any damages.

D. The Contents of Any Insurance Agreement

Defendant WGACA LLC is insured by Travelers Casualty and Surety Company of America, policy no. 106798138, policy period September 1, 2017 to September 1, 2018, with limits of \$1,000,000 for Communications and Media liability; policy number Y-630-4H968547-TCT-17 of Travelers Indemnity Company of Connecticut, policy period August 19, 2017 to August 19, 2018, for General Liability Coverage with General Aggregate limit of \$2,000,000, Personal and Advertising limit of \$1,000,000 and each occurrence limit of \$1,000,000.

Dated: New York, New York
December 4, 2018

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Peter T. Shapiro

Peter T. Shapiro, Esq.

*Attorneys for Defendants WHAT COMES AROUND GOES
AROUND LLC d/b/a/ WHAT GOES AROUND COMES
AROUND, MHW PROPERTIES, INC., WGACA WEB,
LLC, PINES VINTAGE, INC., VINTAGE DESIGNS LTD.,
and WCAGA LA, LLC*

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New York, New York 10005

(212) 232-1300

Peter.Shapiro@lewisbrisbois.com

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Thomas M. Monahan, Esq.
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TMonahan@sheppardmullin.com

CERTIFICATE OF SERVICE

Peter T. Shapiro, an attorney duly admitted to practice before this court, certifies that on December 4, 2018, he caused to be served via email and first class mail this Rule 26 Automatic Disclosure Statement.

/s/ Peter T. Shapiro

Peter T. Shapiro

UNITED STATES DISTRICT COURT
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LLC, PINES VINTAGE, INC., VINTAGE DESIGNS
LTD., and WCAGA LA, LLC,

**SUPPLEMENTAL INITIAL
DISCLOSURES PURSUANT
TO RULE 26**

Defendants
-----X

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, Defendants WGACA, LLC, WHAT COMES AROUND GOES AROUND LLC d/b/a/ WHAT GOES AROUND COMES AROUND, MHW PROPERTIES, INC., WGACA WEB, LLC, PINES VINTAGE, INC., VINTAGE DESIGNS LTD., and WCAGA LA, LLC, collectively "Defendants" herein, hereby make the following **Supplemental Initial Disclosures** to Plaintiff. New Portions are in **bold and underlined typeface**.

A. Persons Likely to Have Pertinent Information Relevant to Disputed Facts in the Pleadings

Name	Address	General Subject Matter of the Discoverable Information
Seth Weisser	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold.
Gerard Maione	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold.

Frank Bober	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold.
Paige Rubin	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold and evaluation procedures.
<u>Ambria Mische</u>	<u>c/o counsel</u>	<u>Defendant WGACA business and acquisition practices for goods being resold and evaluation procedures.</u>

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\$1,000,000 for Communications and Media liability; policy number Y-630-4H968547-TCT-17 of Travelers Indemnity Company of Connecticut, policy period August 19, 2017 to August 19, 2018, for General Liability Coverage with General Aggregate limit of \$2,000,000, Personal and Advertising limit of \$1,000,000 and each occurrence limit of \$1,000,000.

Dated: January 17, 2019

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Thomas S. Kidde

Thomas S. Kidde, Esq. (Pro Hac Vice)

Peter T. Shapiro, Esq.

Daniel C. DeCarlo, Esq. (Pro Hac Vice)

Attorneys for Defendants WGACA, LLC, WHAT COMES AROUND GOES AROUND LLC d/b/a/ WHAT GOES AROUND COMES AROUND, MHW PROPERTIES, INC., WGACA WEB, LLC, PINES VINTAGE, INC., VINTAGE DESIGNS LTD., and WCAGA LA, LLC

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CERTIFICATE OF SERVICE

Thomas S. Kidde, an attorney duly admitted to practice Pro Hac Vice before this Court, certifies that on January 17, 2019, he caused to be served via email this Supplemental Initial Disclosures pursuant to Rule 26.

/s/Thomas S. Kidde

Thomas S. Kidde

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Plaintiff,

- against -

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AROUND, MHW PROPERTIES, INC., WGACA WEB,
LLC, PINES VINTAGE, INC., VINTAGE DESIGNS
LTD., and WCAGA LA, LLC,

**SECOND SUPPLEMENTAL
INITIAL DISCLOSURES
PURSUANT TO RULE 26**

Defendants

-----X

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, Defendants WGACA, LLC, WHAT COMES AROUND GOES AROUND LLC d/b/a/ WHAT GOES AROUND COMES AROUND, MHW PROPERTIES, INC., WGACA WEB, LLC, PINES VINTAGE, INC., VINTAGE DESIGNS LTD., and WCAGA LA, LLC, collectively “Defendants” herein, hereby make the following **Second Supplemental Initial Disclosures** to Plaintiff. New Portions are in **bold and underlined typeface**.

A. Persons Likely to Have Pertinent Information Relevant to Disputed Facts in the Pleadings

Name	Address	General Subject Matter of the Discoverable Information
Seth Weisser	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold.
Gerard Maione	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold.

Frank Bober	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold.
Paige Rubin	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold and evaluation procedures.
Ambria Mische	c/o counsel	Defendant WGACA business and acquisition practices for goods being resold and evaluation procedures.
<u>Adrienne Hahn</u>	<u>c/o counsel</u>	<u>Plaintiff Chanel's identification of Chanel products and advertising, marketing and digital media efforts</u>
<u>Nidhi Kohli</u>	<u>c/o counsel</u>	<u>Plaintiff Chanel's identification of Chanel products and advertising, marketing and digital media efforts</u>
<u>Joyce Green</u>	<u>c/o counsel</u>	<u>Plaintiff Chanel's identification of Chanel products and advertising, marketing and digital media efforts</u>
<u>Robin Gruber</u>	<u>c/o counsel</u>	<u>Plaintiff Chanel's identification of Chanel products and advertising, marketing and digital media efforts</u>
<u>Carol Schettino</u>	<u>c/o counsel</u>	<u>Plaintiff Chanel's identification of Chanel products and advertising, marketing and digital media efforts</u>
<u>Gerry Gallagher</u>	<u>5550 Pin Oak Dr. Doylestown, PA 18902 (215) 794-8676</u>	<u>Handbag repairman and authenticator for Chanel</u>

Probable but as yet unknown experts relating to the industry, consumer surveys and damages claimed by Chanel.

Other persons with knowledge, if any, will be identified during the course of discovery. Defendants reserve the right to identify any additional witnesses during the course of discovery including, but not limited to, any witnesses identified by plaintiff.

B. Description by Category of All Documents and Things in Defendants' Custody and Control Relevant to Disputed Facts Alleged with Particularity in the Pleadings

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C. Computation of Damages Claimed by Disclosing Party

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D. The Contents of Any Insurance Agreement

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Dated: October 3, 2019

LEWIS BRISBOIS BISGAARD & SMITH LLP

/s/ Daniel C. DeCarlo
Daniel C. DeCarlo, Esq. (Pro Hac Vice)
Peter T. Shapiro, Esq.

Thomas S. Kidde, Esq. (Pro Hac Vice)
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CERTIFICATE OF SERVICE

I hereby certify that on October 3, 2019, caused to be served via email this Second Supplemental Initial Disclosures pursuant to Rule 26 upon the attorneys for Plaintiff at the address set forth below by electronic mail:

Theodore C. Max, Esq.
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Hyo Jin Paik, Esq.
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/s/ Jean M. Kim
Jean M. Kim